

BODMAN LLP
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	Chapter 11
GENERAL MOTORS CORPORATION, <i>et al.</i> ,	Case No. 09-50026
	(Jointly Administered)
Debtors.	----- x

**VERIFIED STATEMENT UNDER
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Bodman LLP, as counsel to Bend All Automotive, Inc. (“Bend All”); Brembo North America Inc. (“Brembo”); Citation Corporation (“Citation”); Comerica Bank; Comerica Leasing Corporation (“Comerica Leasing”); Experi-Metal, Inc. (“Experi-Metal”); Entrega Systems Group, Inc. (“Entegra”); Freudenberg-NOK General Partnership (“FNGP”), Freudenberg-NOK, Inc., Freudenberg-NOK de Mexico, S.A. de C.V., Vibracoustic De Mexico S.A. de C.V., Vibracoustic GMBH & Co. KG, Vibracoustic Polska Sp. z.o.o., Sigma Vibracoustic (India) Private Limited, Beltan Vibracoustic A.S., Freudenberg Nonwovens L.P., Freudenberg FCCT KG, Freudenberg Filtration Technologies, L.P., Freudenberg SAS, and Freudenberg & Co. KG (collectively with FNGP, “Freudenberg Entities”); Key Plastics L.L.C (“Key Plastics”); KUKA Systems Corp. North America f/k/a KUKA Flexible Production Systems Corp., KUKA Robotics Corp., and KUKA Assembly & Test Corp. f/k/a B&K Corp (collectively, “KUKA”); Lear Corporation (“Lear”); Marcom Inc. (“Marcom”); Production Modeling Corporation (“PMC”); Techform Products Limited (“Techform”); Wahler Automotive Systems, Inc., Wahler

Metalurgica Ltda, and Gustav Wahler Gmbh (collectively, “Wahler”); Washtenaw County, a Michigan municipal corporation (“Washtenaw County”); Wayne County Airport Authority (“WCAA”) and Wells Fargo Bank, N.A. (“Wells Fargo” and collectively with each of the foregoing entities, “Clients”), submits this Verified Statement under Fed. R. Bankr. P. 2019 and states as follows:

1. Bend All is located at Plant 1 & Head Office, 575 Waydom Drive, Ayr, Ontario, Canada N0B 1E0. Prepetition, Bend All sold parts to one or more Debtors and Bend All has prepetition claims against one or more Debtors. Bodman has served as outside counsel for Bend All for several years.

2. Brembo is located at 15300 Centennial Drive, Northville, Michigan 48168. Prepetition, Brembo sold parts to one or more Debtors and Brembo has prepetition claims against one or more Debtors. Bodman has served as outside counsel to Brembo for several years.

3. Citation is located at Suite 420, 27275 Haggerty Road, Novi, Michigan 48377. Prepetition, Citation sold parts to one or more Debtors and Citation has prepetition claims against one or more Debtors. Bodman has served as outside counsel to Citation for approximately one year.

4. Comerica is located at One Detroit Center, 500 Woodward Avenue, Detroit, Michigan 48226. Prepetition, one or more Debtors maintained bank accounts at Comerica. Comerica may have prepetition claims against one or more Debtors. Bodman has represented Comerica’s interest as a depository bank for one or more Debtors and has acted as one of

Comerica's outside counsel for many years.

5. Comerica Leasing (an affiliate of Comerica Bank) is located at 29201 Telegraph Road, 2nd Floor, Southfield, Michigan 48034. One or more Debtors are party to prepetition lease agreements where Comerica Leasing is the Owner Participant and may have prepetition claims against one or more Debtors. Bodman has acted as one of Comerica Leasing's outside counsel for many years.

6. Experi-Metal is located at 6385 Wall Street, Sterling Heights, Michigan 48312. Prepetition, Experi-Metal sold parts to one or more Debtors and Experi-Metal may have prepetition claims against one or more Debtors. Bodman has acted as outside counsel for Experi-Metal for many years.

7. Entrega is located at 400 E. Big Beaver Rd., #200, Troy, Michigan 48083. Prepetition, Entrega provided Debtors certain website design and development services and Entrega has prepetition claims against one or more Debtors. Bodman was recently retained to serve as outside counsel to Entrega.

8. FNGP is located at 47690 East Anchor Court, Plymouth, Michigan 48170. The other Freudenberg Entities are located at various locations. Prepetition, the Freudenberg Entities sold parts to one or more Debtors and one or more of the Freudenberg Entities have prepetition claims against one or more Debtors. Bodman has served as outside counsel for FNGP for several years.

9. Key Plastics is located at 21700 Haggerty Road, Suite 100 North, Northville, Michigan 48167. Prepetition, Key Plastics sold parts to one or more Debtors and Key Plastics

has prepetition claims against one or more Debtors. Bodman was recently retained as counsel to Key Plastics.

10. KUKA is located at 22500 Key Drive, Clinton Township, Michigan 48036. Prepetition, KUKA sold goods and services to one or more Debtors and has prepetition claims against one or more Debtors. Bodman has acted as one of KUKA's outside counsel for several years.

11. Lear is located at 21557 Telegraph Road, Southfield, Michigan 48034. Lear sold parts to one or more Debtors prepetition and may have prepetition claims against one or more Debtors. Bodman has acted as one of Lear's outside counsel for many years.

12. Marcom is located at 41481 W. 11 Mile Rd., Novi, Michigan 48375. Prepetition, Marcom Inc. provided Debtors certain marketing and communications services and Marcom has prepetition claims against one or more Debtors. Bodman was recently retained to serve as outside counsel to Marcom.

13. PMC is located at 2214 Devonshire Road, Ann Arbor, Michigan 48104. Prepetition, PMC provided parts and services to one or more Debtors and PMC has prepetition claims against one or more Debtors. Bodman has served as outside counsel to PMC for more than ten years.

14. Techform is located at 11 Centennial Drive, Penetanguishene, Ontario L9M1G8. Prepetition, Techform sold parts to one or more Debtors and Techform may have prepetition claims against one or more Debtors. Bodman has acted as one of Techform's outside counsel for several years.

15. Gustav Wahler GmbH u. Co. is located at Hindenburgstraße 146, 73730 Esslingen, Germany. Wahler Metalurgica Ltda is located at Av. Comendador Leopoldo Dedini, 310, CEP 13422-210 Piracicaba, S.P., Brazil. Wahler Automotive Systems, Inc. is located at 13753 Otterson Court, Livonia, Michigan 48150. Prepetition, Wahler sold one or more Debtors goods and services, including valves related to Debtors' internal combustion engines. Bodman has acted as one of Wahler's outside counsel for several years.

16. Washtenaw County is located at 220 N. Main Street, Ann Arbor, Michigan 48104. Washtenaw County is the site of a facility of one or more Debtors. Bodman has acted as one of Washtenaw County's outside counsel for several years.

17. WCAA is located at Detroit Metro Airport, L.C. Smith Terminal - Mezzanine, Detroit, Michigan 48242. WCAA is the landlord for certain real property leased to one or more of Debtors and WCAA may have prepetition claims against one or more Debtors. Bodman has served as outside counsel for WCAA for several years.

18. Wells Fargo is located at 1740 Broadway, Denver, CO., 80274. Prepetition, Wells Fargo was involved in litigation in Macomb County, Michigan, with Debtors concerning unpaid accounts receivable assigned to Wells Fargo. Bodman has represented Wells Fargo's interests with respect to this dispute and has served as counsel to Wells Fargo for many years.

19. There are no instruments or written agreements under which the undersigned counsel, or Bodman in general, is empowered to act for the Clients.

12. Upon information and belief, Bodman does not hold any claim against or interest in Debtors.

BODMAN LLP

By: /s/ Ralph E. McDowell

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